

FILED
CHARLOTTE, NC

United States District Court

FEB 24 2009

WESTERN DISTRICT OF NORTH CAROLINA U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

V.

Curtis L. Watson
13301 Pontchatrain Ave
Charlotte, NC 28273

CRIMINAL COMPLAINT

CASE NUMBER: 3:09mj55

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 9, 2009 in Charlotte, NC in the Western District of North Carolina defendants(s) did, ~~(Track Statutory Language of Offense)~~

with intent to defraud the United States, the Postal Service, or any person, transmit, present, or cause to be transmitted or presented, any money order or postal note knowing the same to contain any forged or counterfeited signature, initials, or any stamped impression, or to contain any material alteration therein unlawfully made.

Shall be fined under this title or imprisoned not more than five years, or both.

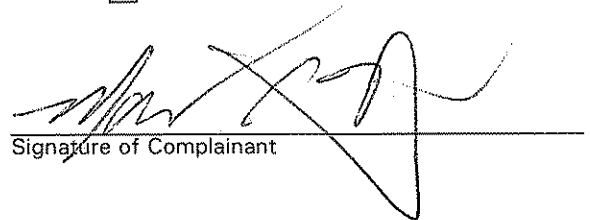
in violation of Title 18 United States Code, Section(s) 500.

I further state that I am a(n) U.S. Postal Inspector and that this complaint is based on the following facts:
Official Title

See attached affidavit

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No


Signature of Complainant

Sworn to before me and subscribed in my presence,

February 24, 2009

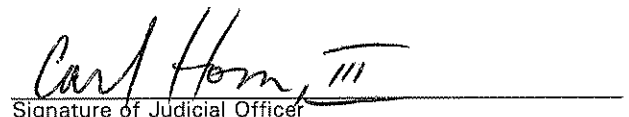
Date

at Charlotte, NC

City of State

Carl Horn III, U.S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT OF MARK A. HEATH

I, Mark A. Heath, a United States Postal Inspector with the United States Postal Inspection Service (USPIS), being duly sworn, state as follows:

I. INTRODUCTION AND PURPOSE OF AFFIDAVIT

1. I am currently employed as a United States Postal Inspector with the USPIIS and have been so employed for the past seven years. During this time, I have been assigned to the Mail Theft/Violent Crimes team where my duties include the investigation of identity theft and access device fraud in connection with the U.S. Mail. The pertinent statutes relating to mail theft and identity theft crimes include Title 18, United States Code, Section 1708, Theft or receipt of stolen mail matter, Title 18, United States Code, Section 1028, Fraud and related activity in connection with identification documents and information, and Title 18, United States Code, Section 1029, Fraud and related activity in connection with access devices.
2. I have had the following education and training. I have received formal instruction from U.S. Postal Inspectors as well as other federal, state and local law enforcement agents who have done extensive work in the areas of mail fraud, mail theft and identity theft. I have received formal classroom training from the U.S. Postal Inspection Service during the 13-week Postal Inspector Basic Training Academy in Potomac, Maryland.
3. Based on my training and experience, I am familiar with the current method of operation that individuals and gangs are using to steal mail, counterfeit checks and access devices, and take over individual identities for the purpose of obtaining cash and other valuables.
4. I make this affidavit in support of a criminal complaint by the United States of America against Curtis L. Watson, who currently resides at 13301 Pontchartrain Ave, Charlotte, NC 28273. As set forth in this affidavit, I have probable cause to believe that Curtis L. Watson has committed violations of Title 18, U.S. Code, Section 500, Money orders, and Title 18, U.S. Code, Section 1029, Fraud and Related Activity in Connection with Access Devices.

II. FACTS

5. The facts in this affidavit are known to me as a result of my personal participation in this investigation or were related to me by other law enforcement officers and witnesses, either personally or by their reports.
6. On January 9, 2009, the U.S. Postal Inspection Service received a report from the Charlotte Post Office, Carmel Station, regarding two females attempting to negotiate altered USPS Money Orders. While postal management was making the report, the two females fled the facility, leaving the Money Orders behind.
7. On that same day, I responded to the scene and retrieved the Money Orders and video surveillance. Statements were obtained from the post office clerks. The clerks stated they obtained NC driver's license information from both women and that the photos on the ID matched

the women presenting the Money Orders. Money Order #16268223600 was made payable to Lakisha Jones. Money Order #16268223622 was made payable to Jasmine Brown.

8. According to USPS records, both Money Orders were originally sold for \$100 on January 7, 2009, but had been altered to show a \$900 value. USPS records revealed eight additional Money Orders sold in the same transaction. Five of those Money Orders were sold for \$100 and five were sold for \$9. Examination of the Money Orders reveals that the number 1 was removed from the Money Orders and replaced with the number 9.
9. On January 16, 2009, Inspector Parnell and I interviewed Jones and Brown. Jones admitted to successfully cashing six Money Orders at Charlotte area post offices between the dates of January 5 through January 9, 2009. Jones stated all of the Money Orders were for \$900 and that she received them from a BMA known to her as Bunk. She described Bunk as 50 YOA, 5'6", grey facial hair, scars on his head, pock marks on face, and small SUV. Jones stated Bunk drove her to post office locations and paid her \$200 for each Money Order she negotiated. Jones provided cell phone # (313)332-7273 as her method of contact with Bunk.
10. In the interview of Brown, she admitted to cashing six Money Orders, each for \$900. Brown described the same scheme and the same BMA and vehicle.
11. A review of USPS records has revealed approximately 34 altered Money Orders cashed in the Charlotte, NC area between September 2008 and February 2009. All of the Money Orders were originally sold for \$100 and altered to show a \$900 value.
12. On February 4, 2009, a Cooperating Source (CS) was interviewed regarding her knowledge of the scheme to cash altered USPS Money Orders. CS stated she received Money Orders from a BMA known to her as Mike. CS described Mike as 40-45 YOA, salt and pepper hair, driving a small SUV. According to CS, she was driven to post office locations and instructed to cash the Money Orders. CS stated she kept portions of the cash in exchange for her work. CS stated Mike contacts her from cell phone # (313)332-7273. CS described a few occasions when a BFA known as Kim Reid picked her up and drove her to locations on Mike's behalf.
13. Beginning on February 4, 2009, CS placed two consensually recorded phone calls to cell # (313)332-7273. During those monitored conversations, Mike scheduled a time and location for him to pick up CS and drive her to the Rock Hill, SC area to conduct business.
14. On February 11, 2009, driving a small Buick SUV with Michigan license plate 8JTK12, Mike met with CS and drove her to four post office locations in the Rock Hill, SC area. Inspectors conducted surveillance on the target vehicle throughout the day as the driver visited the post offices in Rock Hill, York and Fort Mill, SC. CS cashed altered \$900 Money Orders given to her from Mike at each stop. Near the end of the day, Mike provided CS with funds and instructed her to purchase four \$100 Money Orders and four \$9 Money Orders at a Charlotte Post Office station. At the conclusion of the day, CS turned over in excess of \$1000 to Inspectors she received had from Mike for her work that day.
15. A check of Michigan DMV records show license plate 8JTK12 belonging to a 2008 Buick Enclave registered to Brandi R. Watson. A cross reference of databases revealed Brandi Watson residing at 13301 Pontchartrain Ave, Charlotte, NC 28273.
16. On February 12, 2009, I spoke with Postal Inspector Bohanon in Detroit, MI. Inspector Bohanon stated a vehicle registered to Brandi Watson has been associated with a scheme involving the cashing of altered Money Orders in the Detroit, MI area. According to Inspector Bohanon, many of

the altered Money Orders cashed in Detroit were originally sold at post office locations in the Charlotte, NC area.

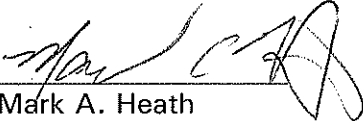
17. A search of records revealed a 2005 motor vehicle accident in Michigan involving a vehicle registered to Watson. Records show the driver of Watson's vehicle was Curtis Watson. Watson's driver records in North Carolina and Michigan describe him as a BMA, 40YOA. Watson provided 13301 Pontchatrain Ave, Charlotte, NC 28273 as his residential address associated with his North Carolina driver's record.
18. On February 17, 2009, I showed a photographic lineup to Jasmine Brown. Brown identified photo #3 as the person who drove her to post office locations and provided her with altered Money Orders. A photo of Curtis Watson was in the #3 position of the lineup.
19. On February 17, 2009, I showed a photographic lineup to CS. CS identified photo #3 as the person who drove her to post office locations and provided her with altered Money Orders. A photo of Curtis Watson was in the #3 position of the lineup.
20. On February 18, 2009, Inspector Mayberry showed a photographic lineup to Lakisha Jones. Jones identified photo #5 as the person who drove her to post office locations and provided her with altered Money Orders. A photo of Curtis Watson was in the #5 position of the lineup.
21. On February 19, 2009, I conducted surveillance at 13301 Pontchatrain Ave, Charlotte, NC 28273. At approximately 7:55am, I observed a person matching the photos of Curtis Watson exit the residence and drive away in a BMW bearing North Carolina license plate YSR-7748. North Carolina DMV records show that vehicle registered to Sulaiman Muntakim Mausi, a person unknown to this investigation. At approximately 8:00am, I observed two BFA, one resembling Brandi Watson, leaving the residence in a Buick Enclave bearing Michigan License plate 8JTK12.
22. On February 19, 2009, I received cell phone tower information from USPS Technical Services Division that cell phone # (313)332-7273, had been located at a business to the east of the intersection of Liverpool Parkway and Chartwell Center Dr, Cornelius, NC. A business located at that location is the Cornelius Post Office. I contacted the Cornelius Post Office and spoke with a window clerk. The window clerk stated he had cashed Money Order #16870182840 in the amount of \$900 earlier that day. Rash described the cashier as a BFA w/ blond or red dyed short hair showing an Ohio ID in the name of Vicki Burt.
23. A review of records determined that Money Order #16870182840 was originally purchased at the Harrisburg, NC Post Office on 2/13/2009 in the amount of \$100 along with a series of other Money Orders purchased for amounts ranging from \$9 to \$150.
24. That same day, I contacted surrounding post offices including the Huntersville, Mooresville, and Davidson Post Offices and learned that a BFA with short blond hair had negotiated or attempted to negotiate altered Money Orders ranging from \$900 to \$950 values using an Ohio ID in the name of Vicki Burt. According to the post offices, the times for the transactions ranged from 9:30am through 4:45pm.
25. On February 23, 2009, Inspector Winters and I drove to 13301 Pontchatrain Ave, Charlotte, NC 28273. Inspector Winters and I retrieved the trash can that had been set out on the curb for collection outside of the address. Among the items recovered from the household trash were two USPS receipts showing Money Order # 16870185044 and 16870185011 cashed for \$900 each at post office locations in Columbia and West Columbia, SC on 2/20/2009. A search of USPS records reveals that these Money Orders were originally sold for \$100 each on February 18, 2009 in Harrisburg, NC.

III. CONCLUSION

26. Based on my training and experience, as well as the facts presented in this Affidavit, there is probable cause to believe that between the dates of January 9, 2009, and continuing through February 20, 2009, Curtis L. Watson has transmitted, presented, or caused to be transmitted or presented, any money order or postal note knowing the same to contain any forged or counterfeited signature, initials, or any stamped impression, or to contain any material alteration therein unlawfully made, in violation of Title 18, U.S. Code, Section 500, Money Orders.

I declare under penalty of perjury that the foregoing is true and correct to the best of my belief.

Executed on the 24th day of February, 2009, at Charlotte, North Carolina.

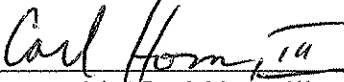


Mark A. Heath

U.S. Postal Inspector

Subscribed to and sworn before me:

This 24th day of February, 2009



Honorable Carl Horn III

U.S. Magistrate Judge